## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY **REGION V**

DATE:

10 MAR 1986

SUBJECT: Superfund Sites With Unpermitted Discharges

FROM: Timothy C. Henry, Unit It Towy Company

Don Schregardus, Chief Compliance Section

As we discussed last week, several of the Superfund sites that I have reviewed have, or appear to have, unpermitted point source discharges. Three come to mind: the Twin Cities Army Ammunition Plant (TCAAP) in New Brighton, MN; the BASF-Wyandotte Dump Site in Riverview, MI; and the Chemical Recovery Site in Elyria, OH.

The TCAAP site is described in the several attached memoranda. The primary type of discharge to the surface waters occurring at present appears to be stormwater runoff. The attached excerpt from the most recent draft compliance agreement provides the best brief description of the site and its history that I have seen. A meeting has been scheduled for 2:00 p.m. on March 10, 1986, in the 230 South Dearborn Building 12th Floor Conference Room, with the Superfund project people (Art Kleinrath and Gene Wong) to discuss the site; perhaps you would like to have somebody in attendance.

The BASF-Wyandotte Dump Site (aka Firestone Dump, aka FMT or Federal Marine Terminal Site) is an industrial dump that was capped pursuant to a negotiated consent agreement. Some or all of the wastes remained in the dump prior to capping. The groundwater is contaminated with organics and heavy metals. Surface discharges are intermittent and consist of stormwater runoff via three stormwater channels and contaminated groundwater seeping into the channels through cracks. Bonnie Elder is the Superfund project person from the site and would be interested in hearing about how your section views the situation.

We discussed the Chemical Recovery Site last week and it was your opinion that the contaminants in the sewer running through the site might not be attributable to Chemical Recovery. I have attached my previous comments on the site to Erin Moran of Waste Management Division. You will see from them that I reached a different conclusion. I recognize that this conclusion was based on the limited information that I had available at the time and that it should be reevaluated. Our two sections should work together to determine (or rather, confirm) the source of the present contamination and take the necessary steps to see that it is discontinued. Please have one of your staff work with me on this; I will keep Erin Moran informed.



Let me know what you think when you have had a chance to review the attachments. I will keep you informed of other Superfund sites that might interest your section as they arise.

## Attachments

cc: w/attachments Mikulka Nagy

w/o attachments
Fenner
Manzarco
Pratt
Dzikowski
Moran (5HE)
Elder (5HE)
Kleinrath (5HE)
Wong (5HR)